

William A. Broschious. (Va. Bar No. 27436)  
KEPLEY BROSCIOUS & BIGGS, PLC  
2211 Pump Road  
Richmond, Virginia 23233  
(804) 741-0400 x202

Counsel to Roy M. Terry, Jr., Trustee

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>In re:</b>	)	<b>Chapter 7</b>
	)	
<b>CELLCON GROUP, INC.,</b>	)	<b>Case No. 17-36015-KLP</b>
	)	
<b>Debtor.</b>	)	

**NOTICE OF HEARING ON TRUSTEE'S MOTION FOR ORDER  
AUTHORIZING BANKRUPTCY RULE 2004 EXAMINATIONS**

**PLEASE TAKE NOTICE** that on August 21, 2018, Roy M. Terry, Jr., Trustee (the "**Trustee**"), in the Chapter 7 bankruptcy case of CellCon Group, Inc. (the "**Debtor**"), filed the attached motion (the "**Rule 2004 Motion**") for an order authorizing and directing discovery by the Trustee of certain third parties identified in the Rule 2004 Motion (the "**Rule 2004 Order**");

**Your rights may be affected.** You should read the Rule 2004 Motion carefully and discuss it with your attorney if you have one in this Bankruptcy Case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the Rule 2004 Motion, or if you want the Court to consider your views on the Rule 2004 Motion, then you or your attorney must:

1. File with the Court, either electronically or at the address shown below, a written objection or other response pursuant to Local Bankruptcy Rule 2004-1(B). If you mail your objection or response to the Court for filing, you must mail it early enough so the Court will **receive it on or before August 28, 2018** (seven business days following service date per Local Rule 2004-1(B)).

William C. Redden, Clerk,  
United States Bankruptcy Court  
701 East Main Street, Suite 4000  
Richmond, Virginia 23219-1888

2. You must also deliver a copy to:

William A. Broschious, Esquire  
Kepley Broschious & Biggs, PLC  
2211 Pump Road  
Richmond, Virginia 23233

Robert B. Van Arsdale, Esquire  
Shannon Pecoraro, Esquire  
Office of the U. S. Trustee  
701 East Broad Street - Suite 4304  
Richmond, Virginia 23219

If you or your attorney do not take these steps, the Trustee will submit the Rule 2004 Order to the Court and the Court may deem any opposition waived, treat the Rule 2004 Motion as conceded, and enter the Rule 2004 Order or such other order granting the relief requested without further notice or hearing.

3. Attend a hearing to be scheduled at a later date and time, if necessary. In the event of a timely filed objection or other response to the Rule 2004 Motion, the Trustee will

obtain a hearing date before the Court and a notice of such hearing shall be filed and served in accordance with applicable law and rules.

Dated: Richmond, Virginia  
August 21, 2018

**ROY M. TERRY, JR., TRUSTEE**

By: /s/ William A. Broschious  
Counsel

William A. Broschious, Esquire (VSB #27436)  
KEPLEY BROSCIOUS & BIGGS, PLC  
2211 Pump Road  
Richmond, Virginia 23233

Tel: 804.741.0400 x202  
[wbroscious@kbbplc.com](mailto:wbroscious@kbbplc.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2018, a true and correct copy of the foregoing was served on all persons receiving electronic notice in these cases, and on each of the following by the first-class mail:

*Office of the U.S. Trustee:*

Robert B. Van Arsdale, Esquire  
Shannon Pecoraro, Esquire  
OFFICE OF THE U. S. TRUSTEE  
701 East Broad Street - Suite 4304  
Richmond, Virginia 23219

*Debtor:*

CellCon Group, Inc.  
8401 Patterson Ave.  
Suite 205  
Henrico, Virginia 23229-6430

*Counsel for the Debtor:*

Jeanne E. Hovenden, Esquire  
Jeanne E. Hovenden, P.L.L.C.  
9830 Lori Road  
P.O. Box 1839  
Chesterfield, Virginia 23832

*Rule 2004 Parties:*

Jimmy Lee and River City Recovery, LLC  
2500 Austin Ave.  
Richmond, Virginia 23223

Andy Duke and Duke Management Services, Inc.  
3420 Pump Road #215  
Henrico, Virginia 23233

/s/ William A. Broschious  
Counsel